

IN THE SUPREME COURT OF IOWA

<p>PLANNED PARENTHOOD OF THE HEARTLAND AND JILL MEADOWS, M.D.,</p> <p>Petitioners-Appellants,</p> <p>v.</p> <p>TERRY BRANSTAD EX REL. STATE OF IOWA AND IOWA BOARD OF MEDICINE,</p> <p>Respondents-Appellees.</p>	<p>Supreme Ct. No. 17-0708</p> <p>Polk Co. District Ct. No. EQCE081503</p> <p>Motion for Leave to Submit Brief of <i>Amici Curiae</i> – Iowa Coalition Against Domestic Violence, et. al., in Support of Planned Parenthood of the Heartland. Inc. and Dr. Jill Meadows, M.D.</p>
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COME NOW the Iowa Coalition Against Domestic Violence (ICADV), Iowa Coalition Against Sexual Assault (ICASA), Interfaith Alliance of Iowa, and the National Women’s Law Center (NWLC) (collectively “the *Amici*”) and move the Court for leave to submit a brief as *amicus curiae* in support of Petitioners Planned Parenthood of the Heartland, Inc. and Dr. Jill Meadows, M.D.

In support of its Motion, the *Amici* state to the Court as follows:

1. The Iowa Coalition Against Domestic Violence (ICADV) is a state level non-profit organization representing 21 local programs providing direct services to survivors of domestic violence. ICADV provides training and technical assistance to member programs and strives to engage all people in changing social and institutional contexts that perpetuate relationship violence. Member programs served approximately 30,000 domestic violence survivors last year. Reproductive coercion is an element of relationship violence that occurs when a partner uses intimidation, threats, or violence to impose his intentions upon a woman’s reproductive autonomy. Victims of relationship

violence have an acute need for timely access to reproductive health services, especially abortion care. Enacting barriers to timely access to abortion services often subjects women to increasing levels of violence.

2. The Iowa Coalition Against Sexual Assault (IowaCASA) is a statewide organization comprising 25 agencies that provide assistance to 10,000 victims of sexual assault annually. IowaCASA focuses on improving the programs and services available to sexual assault survivors and supporting communities to prevent sexual violence before it occurs. The trauma of sexual violence is caused by the loss of power and control over one's body—one's most intimate self. Sexual assault can result in physical and mental health challenges, including injuries and disease related to the assault, shame, terror, depression, guilt, anxiety, addiction, and post-traumatic stress.

3. Founded in 1996, the Interfaith Alliance of Iowa is a statewide, non-partisan organization working to protect both faith and freedom in Iowa. Interfaith Alliance of Iowa celebrates religious freedom by championing the rights of individuals, promoting policies that protect both religion and democracy, and empowering diverse voices to challenge extremism. Interfaith Alliance of Iowa believes it is imperative that, in a healthy democracy, respect is shown for the religious freedom and beliefs of every person and that this is best promoted by maintaining a healthy separation between church and state. Interfaith Alliance of Iowa is made up of people of faith and of no faith from across Iowa who believe in protecting religious freedom, respecting individual rights, and uniting the diverse voices across our state for the common good. Interfaith Alliance of Iowa are Christians, Unitarian Universalists, Jews, Muslims, Sikhs, Hindus, Buddhists, atheists, agnostics, and more. The Interfaith Alliance of Iowa's beliefs intersect with

many issues of civic life and policy including support of religious freedom without it being used to discriminate, civil and human rights, equality, and judicial independence. The arguments that threaten women's reproductive rights are almost exclusively made from a moralistic, religiously driven position. Interfaith Alliance of Iowa has a long history of advocating for the "separation of church and state" so that no one religious belief or voice can insert its beliefs into public policy and infringe on the rights of others. Interfaith Alliance of Iowa believes that a woman's civil rights regarding her body and healthcare decisions must be safeguarded.

4. The National Women's Law Center (NWLC) is a non-profit legal organization that has been working since 1972 to advance and protect women's legal rights. NWLC focuses on issues of key importance to women and their families, including economic security, employment, education, health, and reproductive rights, with special attention to the needs of low-income women and those who face multiple and intersecting forms of discrimination. Because the ability to decide whether to bear children is of tremendous significance to women's full equality, NWLC seeks to preserve women's right to safe, legal abortion, and has filed or participated in numerous *amicus* briefs in state and federal courts in cases that affect this right.

5. As organizations committed to ensuring that women are able to make their own decisions about their lives, including whether to obtain an abortion, without undue interference, the *Amici* have an important interest in the outcome of this case.

6. The attached brief will assist the Court in determining whether Section 1 of Senate File 471 (2017) (to be codified at Iowa Code § 146A.1) ("the Act")—which will force women in Iowa to make an additional and medically unnecessary trip to a

health center for an appointment at least 72 hours before they can obtain an abortion, during which they must undergo an ultrasound and be given state-mandated information intended to promote alternatives to abortion—impermissibly infringes on a woman’s protected constitutional right to abortion.

7. Specifically, the proposed brief provides information and context not found in the parties’ briefs with respect to the negative impact the Act will have on Iowa women. In particular, the proposed brief will elucidate how the barriers that would be imposed by the Act will significantly impede access to abortion services for Iowa’s rural women, low-income women, women in abusive relationships, and sexual assault survivors and affect women’s equality, economic security and ability to care for their families.

8. A Brief of *Amicus Curiae* – Iowa Coalition Against Domestic Violence, et. al., in Support of Appellant Planned Parenthood of the Heartland, Inc., is being conditionally filed in final form concurrently with this motion.

WHEREFORE the *Amici* respectfully request the Court grant it leave to submit its Brief of *Amicus Curiae* and consider the same when resolving the issues in this matter.

/s/ Roxanne Conlin
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